



DAWN M. FLORIO LAW FIRM, PLLC  
*Attorney & Counselors at Law*  
488 Madison Avenue, 20<sup>th</sup> Floor  
New York, NY 10022  
Telephone: (212) 939-9539  
Facsimile: (347) 398-8062  
[DawnMFlorio@yahoo.com](mailto:DawnMFlorio@yahoo.com)

December 2, 2022

VIA ECF

Judge Joanna Seybert  
EASTERN DISTRICT OF NEW YORK  
Alfonse M. D'Amato Federal Building  
United States District Court  
100 Federal Plaza, Courtroom 1030  
Central Islip, New York 11722

RE: *United States v. Robert Leonardi*  
1:21-cr-00452-JS-SIL-2

Judge Joanna Seybert ;

I, Dawn M. Florio, attorney at law, represent Robert Leonardi on the above case matter dated for sentencing on May 8, 2023.

I am formally requesting the approval from your Honor to adjust the curfew order for Mr. Leonardi. Mr. Leonardi is currently under supervision in the EDPA as a courtesy for the EDNY. Since his release he has remained fully compliant with his conditions of release. He has abided by the rules of their Location Monitoring Program; has maintained full time employment; has remained drug free, providing 9 consecutive negative urine specimens. I am requesting that his conditions of release be modified to step him down from his current Location Monitoring status to a "curfew to be determined by Pretrial Services." I also need to add that the defendant has been offered employment opportunities in New Jersey with his current union company. I am also seeking modification of travel condition to travel into New Jersey for employment purposes. Pretrial Charles Meissler, Pretrial Officer Andrew Berglund and AUSA Andrew Wenzel consent to this request. I apologize to the court and all parties for the inconvenience this might cause. I am requesting that this application be acknowledged and considered.

Should your Honor have any questions or concerns, please feel free to contact my office at your earliest convenience.

Sincerely,

Dawn M. Florio

Dawn M. Florio, Esq.  
*Attorney for Robert Leonardi*

CC: All Counsel